

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

DO NO HARM, )  
                    )  
Plaintiff,       )  
                    )  
v.                 )     Case No. 3:23-cv-01175  
                    )  
WILLIAM LEE, in his official capacity as   )  
Governor of the State of Tennessee,       )  
                    )  
Defendant.       )

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**DECLARATION OF CANDYCE WILSON**

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I, Candyce Wilson, declare as follows:

1. I am over 18 years old, of sound mind, and fully competent to attest to the facts stated herein.
2. I am the Unit 1 Director at the Tennessee Department of Health. In that role, I interact with the Board of Podiatric Medical Examiners (“Board”), including in-person.
3. I am familiar with Dr. Bhekumuzi Khumalo. He has served on the Board since October 16, 2019, and is currently the Board’s chairperson. Dr. Khumalo is African-American.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Davidson County, Tennessee on February 21, 2024.



CANDYCE WILSON

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served via this Court's electronic filing system on this 1st day of March 2024.

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